

**JOHN E. LAWLOR, ESQ.**

Attorneys for Defendant

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ROBERT D. PRESS,

Plaintiff,

Index No. 21-cv-10971 (VM)

-against-

PATRICK J. PRIMAVERA,

**DECLARATION OF  
JOHN E. LAWLOR IN  
SUPPORT OF MOTION  
TO DISMISS**

Defendant.

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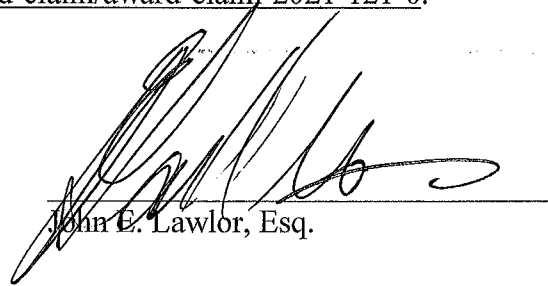
**JOHN E. LAWLOR**, an attorney-at-law admitted to practice in the Courts of the State of New York and in this Court, declares the following under the penalties of perjury pursuant to 28 U.S.C. § 1746:

1. I am the attorney for the Defendant Patrick J. Primavera in this matter.
2. Annexed hereto as Exhibit A is a true and correct copy of the Complaint for Injunctive and Other Relief in the matter of Securities and Exchange Commission v. TCA Fund Management Group Corp., et al., Index No 20-cv-21964 filed in the U.S. District Court for the Southern District of Florida available at <https://ecf.flsd.uscourts.gov/doc1/051022079449>.
3. Annexed hereto as Exhibit B is a true and correct copy of the Order Instituting Administrative and Cease-And Desist Proceedings In the Matter of Robert D. Press,

Respondent, Administrative Proceeding File No. 3-20610, available at

<https://www.sec.gov/whistleblower/award-claim/award-claim-2021-121-0>.

Dated: Mineola, N.Y.  
August 31, 2022



John E. Lawlor, Esq.

TO: Jeffrey Ephraim Glatt, Esq. (via ECF)  
Sondra Denise Grigsby, Esq. (via ECF)  
Marc E. Kasowitz, Esq. (via ECF)  
Albert Shemtov Mishaan, Esq. (via ECF)